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March 25, 2019

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Application of Duke Energy Carolinas, LLC for Adjustments in Electric Rate Schedules and Tariffs and Request for an Accounting Order
Docket No. 2018-319-E

Dear Ms. Boyd:

By letter filed and served on the parties today, the South Carolina Office of Regulatory Staff ("ORS") offers an additional proposal, a "Plan B" if you will, for the establishment of the return on equity ("ROE"). ORS is willing to accept a ROE of 9.76% which is within the range of our expert Mr. David Parcell and was identified by Mr. Gregory Tillman, expert for Walmart, Inc., in his exhibit GWT-4 page 3.

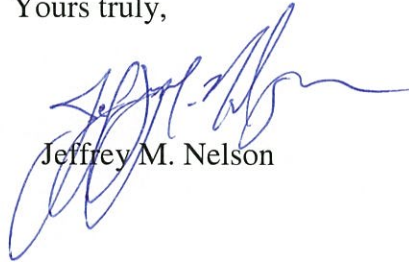
9.76% is the national average for vertically integrated utilities only over a three-year period encompassing 111 decisions. South Carolina customers should not pay rates based on a ROE that is more than the national average ROE for vertically integrated only utilities, and thus ORS offers to agree to a ROE of 9.76%.

Parties that have indicated support for the establishment of a ROE of 9.76% are as follows: Walmart, Inc., and South Carolina Energy Users Committee ("SCEUC"), and parties that have no

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objection include SC NAACP, SC Coastal Conservation League, Upstate Forever, Vote Solar, and the South Carolina Solar Business Alliance, Inc.

Yours truly,



Jeffrey M. Nelson

cc: All Parties of Record (via E-Mail)
Joseph Melchers, Esquire (via E-Mail)